

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:)	Chapter 7
)	Bankruptcy No. 14-13193
TREND SOUND PROMOTER AMG CORP.,)	
)	TRUSTEE'S RESPONSE TO MOTION
Debtor(s).)	AND DECLARATION FOR FINAL FEES
_____)	

COMES NOW the duly appointed trustee, Nancy James, through counsel, The Rigby Law Firm, and Rory C. Livesey, and files this response to the Motion and Declaration for Final Fees filed by Vortman & Feinstein (Feinstein), counsel for the former debtor in possession.

The trustee does not object to the amount of the fees requested by Feinstein. The problem is one of timing. In addition to the employment of Feinstein as bankruptcy counsel the court approved the employment of Annette M. Mouton of Salix Law (formerly Reset Legal Services PLLC) as special counsel for the debtor in possession. (*See* Docket No. 97.) Mouton was the debtor's general counsel prior to the bankruptcy. She has also filed a request for fees. (*See* Docket No. 194.) The hearing on that request is scheduled for the court's October 3rd calendar.

The trustee has some concerns about the Mouton fee application. Among other issues, the motion to employ Mouton states that she was engaged to address matters unrelated to the bankruptcy. (*See* Docket No. 45, Para. 4.) However, there appears to be some duplication of services by Feinstein and Mouton with regard to the bankruptcy, including both attorneys attending the same hearings before this court. The trustee does not want to potentially waive the issue with regard to the Mouton application by not raising the overlapping fees with the Feinstein application. Similarly

1 the trustee does not want to prejudice Mouton by letting the Feinstein application go through without
2 a response.

3 Both applications should be reviewed by the court at the same time. As such, the trustee is
4 requesting that the hearing on the Feinstein application be continued to the court's October 3rd
5 calendar.

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8 DATED this 12th day of September, 2014.

9 THE RIGBY LAW FIRM

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11 */S/ Rory C. Livesey*

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Rory C. Livesey, WSBA #17601
Of Attorneys for Trustee